

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS'
CONCUSSION INJURY LITIGATION

Kevin Turner and Shawn Wooden, on behalf of themselves
and others similarly situated,

Plaintiffs,

v.

National Football League and NFL Properties LLC,
successor-in-interest to NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

CIVIL ACTION NO: 2:14-cv-
00029-AB

DECLARATION OF CLAIMS ADMINISTRATOR, ORRAN L. BROWN, SR.

ORRAN L. BROWN, SR. declares, pursuant to 28 U.S.C. § 1746, based upon his personal knowledge, information and belief, the following:

1. I am over twenty-one years of age. I am the Chairman and a founding partner of BrownGreer PLC ("BrownGreer"), located at 250 Rocketts Way, Richmond, Virginia 23231. I have personal knowledge of the facts set forth herein and if called and sworn as a witness, I could and would testify competently to all matters contained herein.

2. In connection with the class action settlement ("Settlement") in this case, the Court appointed BrownGreer as the Claims Administrator, tasked with, *inter alia*, administering the registration and claims processes and providing supplemental notices to the Class Members as to various administrative matters and deadlines, as directed by the Court and the Settling Parties. As part of my role, I am responsible for managing communications with Class Members, including Retired NFL Football Players.


3. On May 25, 2017, BrownGreer received a telephone call from an unrepresented Settlement Class Member who stated he had received a letter from NFL Case Consulting saying that NFL Case Consulting was terminating its relationship with him on May 19, 2017, because he had not responded to previous letter to him from that group.* The Settlement Class Member also stated that over the last three years, he had been in contact with Kevin Johnson from NFL Case Consulting under the impression he was communicating with the official Settlement Program.

4. On May 25, 2017, BrownGreer received a telephone call from a second unrepresented person who stated she was trying to reach Robert Hirsch with Case Strategies Group. She indicated Robert Hirsch had contacted her because Case Strategies Group was recruiting retired NFL Football Players for the Settlement Program. She also stated the Claims Administrator's telephone number was on the letter she received.

5. On May 26, 2017, BrownGreer received a telephone call from another unrepresented Settlement Class Member who thought Case Strategies Group, not BrownGreer, was the Claims Administrator for the Settlement Program. He stated that Case Strategies Group had sent him information about scheduling an appointment with a doctor.

6. On May 31, 2017, BrownGreer received a telephone call from a fourth unrepresented Settlement Class Member who thought Case Strategies Group was the official Claims Administrator, rather than BrownGreer. The Settlement Class Member was confused about a letter he had received from Case Strategies Group terminating its relationship with him.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 9th day of June, 2017.



Orran L. Brown, Sr.

* The names of the Settlement Class Members who contacted BrownGreer have been omitted to protect their privacy, but are available and can, if the Court deems it necessary, be furnished in a sealed or *in camera* submission.